



State of Arizona
Department of Education

Memorandum

To: Local Education Agency's Officials
From: Shannon Duus, Director of Federal Monitoring
Date: 3/5/2014
Re: Food Purchases within IDEA Basic Entitlement Grants

Can I use my IDEA Basic Entitlement Grant to purchase food?

There is no clear guidance regarding food purchases with Federal Funds.

Overall, the food must be necessary and reasonable for carrying out the federal grant's purpose when purchasing food with Federal Funds. How is that determined?

The US Department of Education has issued new guidance:

"There is a very high burden of proof to show that paying for food and beverages with Federal funds is necessary to meet the goals and objectives for a Federal Grant. While these determinations will be made on a case-by-case basis and there may be some circumstances where the cost would be permissible, it is likely that those circumstances will be rare." Says Monique M. Chism, Director for US Department of Education in a letter to the Missouri State Department of Education.

The general rule we will use as a foundation is:

1. Any purchase of food must be written into the curriculum of a class
2. In cases where the food or snack is part of an individual student's IEP, intervention plan, or other plan of care.
 - For example; If a student's IEP says a school needs to keep food on hand due to diabetic diagnosis or if the student's IEP specifies the use of food to refocus a student as part of a behavioral intervention, then the purchase of food would not only be allowable but required.

If there are any questions or concerns please contact me as soon as possible.

Shannon Duus, MBA
Director of Federal Monitoring
Arizona Department of Education
1535 West Jefferson Bin #3
Phoenix, Arizona 85007
P:(602) 364-4046